

Exhibit 6

From: [Hollingsworth, Jennifer J.](#)
To: [zzz.External.chris@boroughsbryant.com](#); [zzz.External.MMoore@nexsenpruet.com](#)
Cc: [Pergament, Adam](#); [Christopher Mills](#); [Shedd, Michael](#); [Limehouse, Thomas](#); [Lambert, Grayson](#); [La"Jessica Stringfellow](#); [Rob Tyson](#); [Lisle Traywick](#); [Gore, John M.](#); [Kenny, Stephen J.](#); [Mathias, Andrew A.](#); [Wells, Erica H.](#); [Barber, Hamilton B.](#); [zzz.External.Mparente@nexsenpruet.com](#); [Ricard, Rhett D.](#); [Wilkins, William W.](#); [zzz.External.KDiamaduros@nexsenpruet.com](#); [Trinkley, Jane](#); [Crum, Liz](#); [Burchstead, Michael](#); [Nicholson, Thomas](#); [zzz.External.achaney@aclusc.org](#); [zzz.External.acepedaderieux@aclu.org](#); [zzz.External.aingram@naacpldf.org](#); [zzz.External.jcusick@naacpldf.org](#); [Leah Aden](#); [zzz.External.pyan@aclu.org](#); [zzz.External.raudain@naacpldf.org](#); [zzz.External.sosaki@aclu.org](#); [Gryll, Sarah](#); [zzz.External.strivedi@aclu.org](#); [Stuart Naifeh](#); [Freedman, John A.](#); [Hindley, John](#); [Colarusso, Gina](#)
Subject: RE: SC NAACP v. McMaster - Plaintiffs' Responses and Objections to House Defendants' Requests [IWOV-NPCOL1.FID2240915]
Date: Thursday, February 10, 2022 4:54:43 PM

External E-mail

Dear Chris,

Thank you for the letter. I see no need for further exchange on these issues tomorrow morning.

My best,
Jennifer

Jennifer J. Hollingsworth
Member
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Columbia, SC 29201
T: (803) 540-2112, F: (803) 727-1446
JHollingsworth@nexsenpruet.com

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From: Chris Bryant <chris@boroughsbryant.com>
Sent: Thursday, February 10, 2022 3:52 PM
To: Moore, Mark C. <MMoore@nexsenpruet.com>
Cc: Pergament, Adam <Adam.Pergament@arnoldporter.com>; Hollingsworth, Jennifer J. <JHollingsworth@nexsenpruet.com>; Christopher Mills <cmills@spero.law>; Shedd, Michael <MShedd@governor.sc.gov>; Limehouse, Thomas <TLimehouse@governor.sc.gov>; Lambert, Grayson <GLambert@governor.sc.gov>; La'Jessica Stringfellow <lstringfellow@robinsongray.com>; Rob Tyson <rtyson@robinsongray.com>; Lisle Traywick <ltraywick@robinsongray.com>; Gore, John M. <jmgore@jonesday.com>; Kenny, Stephen J. <skenny@jonesday.com>; Mathias, Andrew A. <AMathias@nexsenpruet.com>; Wells, Erica H. <EWells@nexsenpruet.com>; Barber, Hamilton B. <HBarber@nexsenpruet.com>; Parente, Michael A. <MParente@nexsenpruet.com>; Ricard, Rhett D. <RRicard@nexsenpruet.com>; Wilkins, William W. <BWilkins@nexsenpruet.com>; Diamaduros, Konstantine P <KDiamaduros@nexsenpruet.com>; Trinkley, Jane <JTrinkley@burr.com>; Crum, Liz <lcrum@burr.com>; Burchstead, Michael <mburchstead@burr.com>; Nicholson, Thomas

<tnicholson@elections.sc.gov>; achaney@aclusc.org; acepedaderieux@aclu.org; Antonio Ingram <aingram@naacpldf.org>; jcusick@naacpldf.org; Leah Aden <laden@naacpldf.org>; pyan@aclu.org; raudain@naacpldf.org; sosaki@aclu.org; Gryll, Sarah <sarah.gryll@arnoldporter.com>; strivedi@aclu.org; Stuart Naifeh <snaifeh@naacpldf.org>; Freedman, John A. <John.Freedman@arnoldporter.com>; Hindley, John <John.Hindley@arnoldporter.com>; Colarusso, Gina <Gina.Colarusso@arnoldporter.com>

Subject: Re: SC NAACP v. McMaster - Plaintiffs' Responses and Objections to House Defendants' Requests [IWOV-NPCOL1.FID2240915]

{EXTERNAL EMAIL}

Mark:

Attached please find a letter in response to House Defendants' February 4th letter. To the extent there is still a need to meet and confer, we can be available tomorrow at either 9:00 or 9:30.

Chris



Christopher J. Bryant | Partner
BOROUGHES BRYANT, LLC
1122 Lady Street, Suite 208 | Columbia, SC 29201
E: chris@boroughsbryant.com | C: 843.779.5444

On Thu, Feb 10, 2022 at 3:29 PM Moore, Mark C. <MMoore@nexsenpruet.com> wrote:

Adam:

Jennifer and I are both available tomorrow at either 9 or 9:30. We have not received your promised letter yet nor have we received a response to our question about when we can expect your privilege log.

We hope the Plaintiffs will have someone on the phone who can speak with authority on the issues we raised in our letter. If we do not receive satisfactory responses to the issues raised in our letter in your written response and during the anticipated meet and confer, we will be filing our motion to compel in short order and will request that the court hear that motion during the hearing that has been set for Tuesday.

Best,

Mark

Sent from my iPhone

On Feb 9, 2022, at 7:54 PM, Moore, Mark C. <MMoore@nexsenpruet.com> wrote:

Adam:

We disagree with your assertions about our letter. We will, however, be available to meet Friday after we receive and review your written response. Please let us know precisely when we can expect to receive your privilege log.

Best,

Mark

Sent from my iPhone

On Feb 9, 2022, at 7:48 PM, Pergament, Adam
<Adam.Pergament@arnoldporter.com> wrote:

{EXTERNAL EMAIL}

Mark,

We disagree that you are “required to file a motion to compel,” and we continue to believe that a meet and confer would be the most productive course, if only because, as far as we can tell, House Defendants’ letter does not identify a genuine dispute. We remain available to discuss tomorrow – either at noon, when you requested a written response to your letter, or following your deposition – if you cannot wait until Friday morning.

If you are unwilling to meet and confer without a written response, we will provide one tomorrow, and we can meet on Friday morning. Your demand for a privilege log as a precondition to a meet and confer is not appropriate. However, Plaintiffs intend to provide a privilege log this week.

Thank you.

From: Moore, Mark C. <MMoore@nexsenpruet.com>

Sent: Wednesday, February 9, 2022 3:44 PM

To: Pergament, Adam <Adam.Pergament@arnoldporter.com>

Cc: Hollingsworth, Jennifer J. <JHollingsworth@nexsenpruet.com>;

zzz.External.chris@boroughsbryant.com <chris@boroughsbryant.com>;
 Christopher Mills <cmills@spero.law>; Shedd, Michael
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 Mathias, Andrew A. <AMathias@nexsenpruet.com>; Wells, Erica H.
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 <achaney@aclusc.org>; zzz.External.acepedaderieux@aclu.org
 <acepedaderieux@aclu.org>; Antonio Ingram
 <aingram@naacpldf.org>; zzz.External.jcusick@naacpldf.org
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zzz.External.sosaki@aclu.org <sosaki@aclu.org>; Gryll, Sarah
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 John A. <John.Freedman@arnoldporter.com>; Hindley, John
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Subject: Re: SC NAACP v. McMaster - Plaintiffs' Responses and
 Objections to House Defendants' Requests [IWOV-
 NPCOL1.FID2240915]

External E-mail

Adam:

The letter to which you refer was sent last Friday. As I assume you know, we have 3 depositions of your experts scheduled for tomorrow that Jennifer, Andrew and I are taking— and we have yet to receive much in the way of meaningful discovery from your team.

We are also spending substantial time and energy producing a privilege log that your team insisted we produce (which has limited our ability to continue to produce documents to you) although we have yet to receive one from your team. Finally, I would remind you that discovery is set to close in 8 days.

We are willing to conduct a meet and confer with you Friday morning provided we receive a letter from you fully responding to our letter by noon tomorrow—to be followed by a draft privilege log tomorrow evening. If we do not receive a fulsome response to our letter by noon tomorrow, we will believe we will be required to proceed with a motion to compel. In our view, the Plaintiffs have had more than sufficient time to respond to the issues we have raised in Jennifer's letter dated February 4th.

Best,

Mark

Sent from my iPhone

On Feb 9, 2022, at 2:57 PM, Pergament, Adam
<Adam.Pergament@arnoldporter.com> wrote:

{EXTERNAL EMAIL}

Ms. Hollingsworth,

Thank you for your letter concerning Plaintiffs' discovery responses. We disagree with several assertions in your letter, but rather than respond point by point, we propose setting up a meet-and-confer call to discuss your concerns. Please advise if you are available either tomorrow, February 10, in the afternoon, or Friday, February 11, in the morning.

Thank you.

From: Hollingsworth, Jennifer J.

<JHollingsworth@nexsenpruet.com>

Sent: Friday, February 4, 2022 8:45 PM

To: zzz.External.chris@boroughsbryant.com

<chris@boroughsbryant.com>; Christopher Mills

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mshedd@governor.sc.gov; Limehouse, Thomas
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AMathias@nexsenpruet.com; Wells, Erica H.
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Cc: zzz.External.achaney@aclusc.org
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John.Freedman@arnoldporter.com; Hindley, John
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Adam.Pergament@arnoldporter.com; Colarusso, Gina
Gina.Colarusso@arnoldporter.com
Subject: RE: SC NAACP v. McMaster - Plaintiffs' Responses
 and Objections to House Defendants' Requests [IWOV-
 NPCOL1.FID2240915]

External E-mail

Dear Chris,

Attached please find a discovery consultation letter directed to Plaintiffs.

My best,
Jennifer

Jennifer J. Hollingsworth
Member
Nexsen Pruet, LLC
1230 Main Street, Suite 700
Columbia, SC 29201
T: (803) 540-2112, F: (803) 727-1446
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<image001.png>

From: Chris Bryant <chris@boroughsbryant.com>
Sent: Wednesday, February 2, 2022 6:02 PM
To: Christopher Mills <cmills@spero.law>; Shedd, Michael <mshedd@governor.sc.gov>; Limehouse, Thomas <tlimehouse@governor.sc.gov>; Lambert, Grayson <glambert@governor.sc.gov>; La'Jessica Stringfellow <lstringfellow@robinsongray.com>; Rob Tyson <rtyson@robinsongray.com>; Lisle Traywick <ltraywick@robinsongray.com>; Gore, John M. <jmgore@jonesday.com>; Kenny, Stephen J. <skenny@jonesday.com>; Mathias, Andrew A. <AMathias@nexsenpruet.com>; Wells, Erica H. <EWells@nexsenpruet.com>; Barber, Hamilton B. <HBarber@nexsenpruet.com>; Hollingsworth, Jennifer J. <JHollingsworth@nexsenpruet.com>; Moore, Mark C. <MMoore@nexsenpruet.com>; Parente, Michael A. <MParente@nexsenpruet.com>; Ricard, Rhett D. <RRicard@nexsenpruet.com>; Wilkins, William W. <BWilkins@nexsenpruet.com>; Diamaduros, Konstantine P <KDiamaduros@nexsenpruet.com>; Trinkley, Jane <jtrinkley@burr.com>; Crum, Liz <lcrum@burr.com>; Burchstead, Michael <mburchstead@burr.com>; Nicholson, Thomas <tnicholson@elections.sc.gov>

Cc: Allen Chaney <achaney@aclusc.org>; Adriel I. Cepeda Derieux <acepedaderieux@aclu.org>; Antonio Ingram <aingram@naacpldf.org>; John Cusick <jcusick@naacpldf.org>; Leah Aden <laden@naacpldf.org>; Patricia Yan <pyan@aclu.org>; Raymond Audain <raudain@naacpldf.org>; Samantha Osaki <sosaki@aclu.org>; Gryll, Sarah <sarah.gryll@arnoldporter.com>; Somil Trivedi <strivedi@aclu.org>; Stuart Naifeh <snaifeh@naacpldf.org>; Freedman, John A. <John.Freedman@arnoldporter.com>; Hindley, John <John.Hindley@arnoldporter.com>; Pergament, Adam <Adam.Pergament@arnoldporter.com>; Colarusso, Gina <Gina.Colarusso@arnoldporter.com>
Subject: SC NAACP v. McMaster - Plaintiffs' Responses and Objections to House Defendants' Requests

{EXTERNAL EMAIL}

Counsel,

Attached please find Plaintiffs' Objections and Responses to House Defendants' (1) First Set of Requests for Admission; (2) First Set of Requests for Production; (3) First Set of Interrogatories to SC NAACP; and (4) First Set of Interrogatories to Taiwan Scott.

Chris

<image003.png>

Christopher J. Bryant | Partner

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